

REMARKS

We have carefully considered the Office action dated December 13, 2007, in which claims 20 and 21 are rejected under 35 U.S.C. § 101 and claims 1-21 are rejected as obvious over a combination of the McCormick and Erickson patents. We have amended independent claim 20 to overcome the § 101 rejection, and claim 20, as amended, and claim 21 which depends therefrom should now be in condition for allowance. We thank the Examiner and his supervisor for a telephone interview, and for suggestions for claim language. In response to the interview, we have amended the independent claims to incorporate suggested language.

We question the Examiner's contention that we have previously argued two cited references individually when a combination was cited. The Examiner states that the Erickson patent is cited to add to McCormick a teaching of a multiple node tree structure for groups of computers – a teaching that the Examiner states is missing from the primary McCormick reference. While we agree with the Examiner that McCormick does not disclose such a tree structure, we have argued that Erickson teaches a hierarchical tree structure, and thus, also lacks a teaching of the multiple node tree structure set forth in the independent claims – that is, that Erickson does not provide the missing teaching to McCormick. We then argue that the combination does not teach or suggest the current invention because the combination can not teach what is missing from both references.

We discuss the two cited references in more detail below. Before doing so we point out that the claims relate to particular tree structures of groups and particular reports

- not generic tree structures and generic reports.

Pending claim 1, as amended, reads in pertinent part:

- A. determining a multiple node tree structure of groups for the computers, in which each node is a group level and a top level is a root, ***based on primary grouping criteria and secondary grouping criteria*** that correspond to selected computer profile data;
- B. including, in a group mapping table, one or more fields for the primary grouping criteria and one or more fields for the secondary grouping criteria, and including in those fields, in respective table records, values corresponding to the selected computer profile data that are utilized in the primary grouping and the secondary grouping criteria ***with the values associated with either or both of the primary grouping criteria and the secondary grouping criteria being ranges that extend between selected high and low values***; (emphasis added)

The multiple node tree structure is a *particular* structure in which each node is a group level that is based on primary grouping criteria and secondary grouping criteria, and one or both of the primary grouping criteria and secondary grouping criteria consist of ranges of values of selected computer profile data. The tree is not a hierarchical tree structure, as is taught by Erickson.

Specifically, the respective nodes in the Erickson hierarchical tree are groups based on a single feature. For example, the node labeled “United States” in Fig. 5 of Erickson is based on language, and the node labeled “x86” is based on processor type. Another node based on processor type, e.g., “Alpha” connects to the x86 node, while another node based on a processor, namely, “PPC” connects to the Alpha node. The Erick-

son tree is thus a "cluttered" hierarchical arrangement, where one must go through several nodes to arrive at, for example, the PPC node within the United States group.

In stark contrast, the tree of claim 1 is uncluttered. Using the Erickson criteria as an example, the tree of claim 1 includes a single node that represents a selected language or range of languages *and* a selected processor type or range of processor types. Accordingly, a user can select primary and secondary grouping criteria to produce a tree with a desired non-hierarchical, non-cluttered structure. This is important for the reporting of information to the user, as discussed during the interview and again below.

Further, as set forth in claim 1 as amended, the particular multiple node tree structure is based on primary grouping criteria and secondary criteria in which one or both criteria correspond to **ranges of values** of selected computer profile data. As discussed during the interview, there is no teaching or suggestion in a combination of the teachings of McCormack with the added hierarchical tree structure of Erickson, of using ranges of values as primary and/or secondary grouping criteria for group levels that are respective nodes of the tree.

Claim 1, as amended, further reads

F. manipulating the computer profile data from the database and producing, for a selected group level, reports that contain summaries of certain or all of the attributes of the computers that are in the selected group level or below in the tree.

As discussed during the interview, the combination of McCormick and Erickson does not teach or suggest producing the *particular* reports set forth in claim 1, that is, reports that

for a selected group level include summaries of the attributes of the computers that are in that group level and below in the tree structure. We have included in the response two reports that illustrate summaries of computer attributes, one at a Group West level and one at a lower Group West/Marketing level. Based on the summaries in the reports, a user can determine, for example, a total number of products that are under licensed in a given group level and the levels below it on the tree.

The combination of the McCormick and Erickson does not teach producing similar reports. McCormick teaches producing, for a given group, a view that is defined by the associated filters. See, e.g., Col. 13, lines 56-59. The view consists of a list of devices and filter-specific information. See, e.g., Col. 16, lines 31-34. The Examiner has equated filters with grouping criteria, and thus, McCormick teaches producing reports that are based on the grouping criteria for a given group.

Combining the hierarchical tree structure taught by Erickson with the views of McCormack results in a view of hierarchically arranged groups that lists the devices in the groups and associated grouping criteria related information. Accordingly, there is no teaching or suggestion in the combination of a system that produces a report for a selected group level that includes summaries of the attributes of computers in the group level and below on the tree.

Claim 1 also reads:

E. for the profile data from a given computer
extracting the selected profile data that are utilized in the
primary groupings and the secondary groupings,

querying the group mapping table to determine if the extracted profile data correspond to the respective values that are included in the primary grouping fields and the secondary grouping fields in any of the records in the table, and

if the query results in no records, assigning the computer to a default group,

if the query results in one table record, assigning the computer to the group that is named in the record,

if the query results in multiple table records that include secondary low values, assigning the computer to the group that is named in the record that is in a first predetermined position in the order in which the records are returned, or

if the query results in multiple records and there are no corresponding secondary low values in the records, assigning the computer to the group that is named in the record that is in a second predetermined position in the order in which the records are returned; (emphasis added)

As discussed above and during the interview, a combination of McCormick and Erickson does not teach or suggest using primary and secondary criteria for a given group level or node on a multiple node tree. Accordingly, the combination does not teach or suggest a primary/secondary relationship in the grouping criteria as set forth in claim 1 as amended

Rather, a combination of the teachings of McCormack with Erickson, which adds to McCormack a hierarchical tree structure of groups, does not teach or suggest the invention as set forth in independent claim 1 as amended and the claims that depend therefrom because, *inter alia*, the combination does not teach or suggest the particular tree structure, the particular reports or the assignment of a computer to a group level based, in part, on the presence or absence of secondary low values in records retrieved from a database table, as set forth in independent claim 1 as amended and the claims that depend therefrom.

Similarly, the combination does not teach or suggest the invention as set forth in independent claim 7, as amended, and the claims that depend there from because, *inter alia*, the combination does not teach or suggest the particular multiple node tree structure based on primary grouping criteria that correspond to ranges of values of computer profile data, that is, ranges that extend between selected high and low values of the computer profile data. Further, the combination does not teach or suggest producing reports that summarize the attributes of computers in a selected group level and below on the multiple node tree. Specifically, there is no teaching or suggestion in the combination of how to group computers that meet the primary grouping criteria, that is, fall within ranges of values for selected computer profile data, of more than one group, as is set forth in claim 7.

Thus the combination does not teach or suggest the invention as set forth in independent claim 7 and the claim that depends therefrom because, *inter alia*, the combination does not teach or suggest the step of determining the particular multiple node tree structure or the steps of assigning a computer to a group based on ranges of values of primary grouping criteria, and producing the particular reports that are based on the tree structure all as set forth in independent claim 7.

For the same reasons discussed above the combination does not teach or suggest the invention of independent method claim 12, as amended, and the claims that depend therefrom, and independent system claim 20, as amended, and the claim that depends therefrom.

In light of the above, the claims, as amended, should be in form for allowance. We request that the Examiner reconsider the rejections and issue a Notice of Allowance

for all claims. We thank the Examiner for his willingness to discuss the claims in more detail should he consider a further Office Action other than a Notice of Allowance.

Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Patricia A. Sheehan", written over a horizontal line.

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